

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF DELAWARE**

MICHAEL NINIVAGGI, JAKE MICKEY,
CAILIN NIGRELLI and HANNAH RUSSO,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

UNIVERSITY OF DELAWARE,

Defendant.

Civil Action No. 20-cv-1478-SB

JOINT NOTICE OF SETTLEMENT

Plaintiffs, Michael Ninivaggi, Jake Mickey, Cailin Nigrelli and Hannah Russo, and Defendant, the University of Delaware, hereby submit this joint notice of settlement to inform the Court that the Parties have reached agreement on all material terms of a class action settlement of this matter. The Parties will finalize a full-form settlement agreement and Plaintiffs will file a Motion for Preliminary Approval of the Class Action Settlement on or before June 7, 2023.

Dated: April 27, 2023

**CHIMICLES SCHWARTZ KRINER &
DONALDSON-SMITH LLP**

/s/ Robert J. Kriner, Jr.
Robert J. Kriner, Jr. (#2546)
2711 Centerville Road, Suite 201
Wilmington, DE 19808
(302) 656-2500
robertkriner@chimicles.com

Attorneys For Plaintiffs

SAUL EWING LLP

/s/ James D. Taylor, Jr.
James D. Taylor, Jr. (#4009)
1201 N. Market Street, Suite 2300
Wilmington, Delaware 19801
(302) 421-6800
james.taylor@saul.com

Attorney for Defendant